RETURN DATE: JULY 5, 2022 : SUPERIOR COURT

STATE FARM FIRE & CASUALTY CO. : J.D. OF FAIRFIELD

VS : AT BRIDGEPORT

AYESHIA WALKER : JUNE 10, 2022

## **COMPLAINT**

1. The plaintiff, State Farm Fire and Casualty Company, brings this action a subrogee of its insured, Taja Simmons.

- 2. On or about June 22, 2020 Taja Simmons was a tenant/lessee of the first floor apartment located at 49 Center Street, Bridgeport, Connecticut.
- 3. On or about June 22, 2020 the plaintiff, State Farm Fire and Casualty Company, insured Taja Simmons under a renter's policy for Taja Simmons' personalty located within her first Floor, 49 Center Street, Bridgeport, Connecticut apartment.
- 4. On or about June 22, 2020 the defendant, Ayeshia Walker, was a tenant/lessee of the second floor apartment located at 49 Center Street, Bridgeport, Connecticut.
- 5. On or about June 22, 2020 water leaked from the defendant's second floor apartment and flowed into the plaintiff's insured's first floor apartment, thereby causing water damage to the plaintiff's insured's personalty located within her first floor apartment causing damage in the amount of \$12,398.05.
- 6. The damages and losses referenced hereinabove were caused by the carelessness and negligence of the defendant, Ayeshia Walker, in that she failed to inspect and/or monitor

the bathroom sink while filling same with water when she knew or should have known that water would overflow from said sink upon being filled.

7. Pursuant to its policy of insurance with Taja Simmons, the plaintiff, State Farm Fire and Casualty Company, paid \$12, 398.05 to Taja Simmons for the damage sustained to the first floor and to the personalty located therein as a result of the above mentioned incident.

WHEREFORE, the plaintiff's claim

a. money damages

b. post judgment interest.

PLAINTIFF, STATE FARM FIRE & CASUALTY CO.

Donald P. Cianci

Donald P. Cianc Its Attorney

## **CLAIM FOR RELIEF**

The amount of damages claimed in the foregoing matter are more than \$5,000.00, and not more than \$15,000.00, exclusive of legal interest and costs.

> PLAINTIFF, STATE FARM FIRE AND CASUALTY CO.

BY

Donald P. Cianci Its Attorney